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For The Earth Corporation and
Nelson Grist*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

FRANK UNDERHILL, JR., an individual,

Plaintiff,

vs.

FOR THE EARTH CORPORATION, an
Arizona Corporation; NELSON GRIST, an
individual; DOES I through X, inclusive; and
ROE ENTITIES XI through M, inclusive,

Defendants.

Case No.: 2:21-cv-01287-JAD-VCF

STIPULATED:

- (1) NOTICE OF SETTLEMENT;**
- (2) REQUEST FOR STAY; and**
- (3) REQUEST FOR STATUS CHECK**

The undersigned counsel of record for Defendants For The Earth Corporation and Nelson Grist ("Defendant,") by and through their counsel of record, Jackson Lewis, P.C., and Plaintiff Frank Underhill, Jr. ("Plaintiff"), by and through his counsel, hereby file this Stipulated Notice of Settlement and Request for Stay and Status Check. The parties have reached a full resolution of this matter and are working to finalize the language of the settlement agreement. The parties need enough time to complete the settlement process, including the issuance of settlement funds, in order to file a stipulation and order to dismiss this action. Thus, the parties request that the Court schedule a settlement status check conference in approximately 120 days, at the Court's convenience, to permit the parties time to complete the settlement process and file a stipulation and order for dismissal. The

status check can be vacated if the Stipulation and Order for Dismissal with Prejudice is entered by the Court as an order in advance thereof.

The parties also request that the Court stay all pending deadlines including those set forth in the Order Granting Stipulation to Extend Discovery (ECF No. 19). The parties wish to avoid incurring additional fees and costs complying with the pending deadlines while the parties prepare the necessary settlement documents and dismissal.

Dated this 8th day of April, 2022.

LAW OFFICE OF BYRON THOMAS

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/s/ Byron E. Thomas

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ORDER

IT IS HEREBY ORDERED that the stipulation and order to extend the discovery cutoff and dispositive motion deadlines (ECF No. 20) is DENIED as moot.

IT IS SO ORDERED:

United States Magistrate Judge

Dated: 4-8-2022